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October 11, 2009

Mr. James Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

**Re: Monthly Progress Report for September 2009, North Bronson Industrial Area
Site Operable Unit 1, Bronson, Michigan**

Dear Mr. Hahnenberg:

The North Bronson Potentially Responsible Parties Group (the Group) submits this monthly progress report to the U.S. Environmental Protection Agency (USEPA), Region 5, pursuant to Article X (Reporting Requirements), Paragraph 31 of the Consent Decree for Operable Unit 1 at the North Bronson Industrial Area (NBIA) Site. This report summarizes efforts by the Group to fulfill the requirements of the Consent Decree for Remedial Design and Remedial Action (RD/RA) at the site during September 2009.

1. Activities Completed During This Reporting Period

- A. On September 9, 2009, the Group submitted the August 2009 monthly progress report to USEPA with copies to MDEQ.
- B. On September 14, 2009, the Group submitted to USEPA responses to comments received from MDEQ (via letters dated September 11, 2009) with respect to the following:
 - Proposed City of Bronson Groundwater Ordinance submitted on June 4, 2009; and
 - *County Drain #30 Sediment and Soil Sampling Work Plan*, submitted on February 27, 2009.

2. Results of Sampling and Tests and Other Data

- A. The Group developed no sampling or test data during the reporting period.

3. Work Plans, Procedures, and Deliverables

- A. The Group submitted no work plans, procedures, or deliverables during the reporting period.
- B. As described in its letter to USEPA of September 14, 2009, the Group agreed to revise certain aspects of the *County Drain #30 Sediment and Soil Sampling Work Plan* in response to comments received from MDEQ.

4. Actions Projected for Next Six-Week Period

- A. The actions projected for the next six-week period depend on the timing of USEPA approvals and authorizations to proceed, as described in Item 5.A below.

5. Progress and Schedule Report

- A. Near-term milestones for on-going Group activities are as follows:

Groundwater Delineation Study

- Following USEPA approval, the Group will complete the Groundwater Delineation Study, including installation of additional wells as described in our meeting discussion of March 17, 2009 and a second round of groundwater sampling of newly installed wells. The estimated timeframe for this activity, including laboratory analysis, data validation, and reporting, is eight weeks after mobilization.

County Drain #30 Sediment and Soil Sampling

- The Group will initiate the CD #30 sediment and soil sampling upon resolution of comments received from the MDEQ and authorization to proceed from USEPA. The projected schedule for this activity is provided in the corresponding work plan.

Private Well Connections

- Because of delays caused in part by MDEQ comments on the proposed City ordinance, the schedule for the water line connections for residents

within the restricted and buffer zones who currently have private wells has been put off until the spring of 2010. City personnel who will make the tap-in connections to City water lines are unable to perform this work yet this fall.

- As discussed in our meeting of March 17, 2009, progress related to RD/RA for enhanced source control at the Eastern and Western Lagoon Areas and County Drain #30 remediation requires resolution of appropriate cleanup standards for non-erodible soils associated with County Drain #30 and groundwater to surface water interface (GSI) criteria.

- B. There are currently no other unresolved issues that affect the performance or timing of pre-design or RD activities.

6. Summary of Proposed or Approved Changes to the Work Plans or Schedules

- A. Each of the work plans for the ongoing tasks described in Item 5A above include addenda to the Pre-Design Studies Field Sampling and Quality Assurance Plan (FSQAP). These addenda provide for additional sampling and analytical protocols associated with those efforts. These work plans also include addenda to the site Health and Safety Plan to address task-specific health and safety issues.
- B. The near-term milestones associated with the most-recent working schedule update are those identified in Item 5.A above.

7. Activities Undertaken in Support of the Community Relations Plan

- A. The Group did not undertake any activities during this reporting period in support of the Community Relations Plan.

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We trust that this submittal satisfies your requirements at this time. If you have questions regarding this monthly progress report or related project matters, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'LMB', with a long horizontal line extending to the right.

Leo M. Brausch
Project Coordinator

LMB:

cc: Deborah D. Larsen, MDEQ
Charles W. Graff, MDEQ

cc (via email):

NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee
